

Guide for Review of Individual Economic Development Activities			
Name of Program Participant:			
Staff Consulted:			
Activity Name, Number and Brief Description:			
Name(s) of Reviewer(s)		Date	

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding.**"

Instructions: Complete this Exhibit for each economic development project or activity selected as part of the monitoring review. HUD reviewers should select an appropriate sample (either randomly or judgmentally selected). The Exhibit is divided into four sections: Eligibility; National Objective Compliance; Economic Development Public Benefit Standards; and Other Requirements.

Questions:

A. ELIGIBILITY

1.

a. Indicate below which eligibility provision of Subpart C this activity was classified under: 24 CFR 570.203(a), 570.203(b), 570.203(c), 570.204(a)(2), 570.201(o), or another provision.	
Describe Basis for Conclusion:	
b. Does the project file contain the name and address of the assisted business? [24 CFR 570.506(a)]	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion:	

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CDBG Entitlement Program

c. Is there any evidence to indicate that the activity is ineligible or improperly classified? [24 CFR 570.201 through 24 CFR 570.205]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion: <div style="height: 80px; border: 1px solid black;"></div>		

d. If the activity was classified as eligible under 24 CFR 570.204, briefly describe the nature and make up of the qualifying Community Based Development Organization (CBDO).
Describe Basis for Conclusion: <div style="height: 80px; border: 1px solid black;"></div>

2.

a. What form did the CDBG assistance take (e.g., loan, grant, loan guarantee)?
Describe Basis for Conclusion: <div style="height: 80px; border: 1px solid black;"></div>

b. Indicate below: (1) the program year(s) and date(s) CDBG funds were obligated: _____ (or HUD-Admin. Small Cities in New York or Insular area grants) (2) the amount of CDBG funds obligated for this activity: _____ (3) the amount of CDBG funds expended at the date of this monitoring: _____ [24 CFR 570.506(a)]
Describe Basis for Conclusion: <div style="height: 80px; border: 1px solid black;"></div>

B. NATIONAL OBJECTIVE COMPLIANCE

3.

Which national objective does the program participant claim that the activity has met or will meet? (Provide regulatory citation.)
Describe Basis for Conclusion:

4.

a. Did the activity, or is the activity expected to, comply with this national objective? (Based upon the response to question 3 above, the HUD reviewer should use the appropriate CDBG Entitlement National Objective Exhibits 3-2 through 3-9 to answer this question and summarize any conclusions below.) [24 CFR 580.208]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

b. Is there a written agreement between the program participant and the business regarding their commitment to create low- and moderate-income jobs OR documentation to support low- and moderate-income benefits based on the retention of jobs as applicable? [570.506(b)(5) and/or 570.506(b)(6)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

C. SPECIAL ECONOMIC DEVELOPMENT -- PUBLIC BENEFIT STANDARD (NOTE: Exhibit 3-13 will also be used with regard to the aggregate standards.)

5.

Did the program participant conduct basic financial underwriting prior to providing financial assistance to a for-profit business per the guidelines of 24 CFR 570.209(a)? (NOTE: Activities carried out under 24 CFR 570.201(o) are excepted.)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: 	

6.

a. What was the <i>proposed</i> number of FTE jobs: To Be Created? _____ and/or To Be Retained? _____?
Describe Basis for Conclusion:
b. What was the <i>actual</i> number of FTE jobs: Created? _____ / Retained? _____
Describe Basis for Conclusion:
c. What was the <i>proposed</i> number of low- and moderate-income persons residing in the area? _____
Describe Basis for Conclusion:

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d. What was the *actual* number of low- and moderate-income persons residing in the area?

Describe Basis for Conclusion:

7.

For the individual public benefit standard, was the activity expected to create or retain one FTE permanent job per \$50,000 of CDBG assistance OR benefit at least one low- and moderate-income person for every \$1,000 of CDBG assistance? [24 CFR 570.209(b)(3)(i)(A) OR 24 CFR 570.209(b)(3)(i)(B)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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Describe Basis for Conclusion:

D. OTHER REQUIREMENTS

8.

If applicable, is there documentation to support compliance with the Lead Hazards requirements of 24 CFR Part 35? (Use appropriate Exhibits in Chapter 24 to answer this question.) [24 CFR 570.608]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
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Describe Basis for Conclusion:

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9.

If CDBG funds were used to rehabilitate the property, and if any tenants or owners were required to relocate permanently or temporarily, were the Uniform Relocation Requirements followed? (If needed, refer to your Regional Relocation Specialist for assistance with this question.) [24 CFR 570.606 and 49 CFR 24]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion: <div style="height: 80px; border: 1px solid black;"></div>			

10.

Were the environmental requirements at Part 58 met? (Use the applicable Exhibit(s) in Chapter 21 to answer this question.)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion: <div style="height: 80px; border: 1px solid black;"></div>		

11.

If applicable, were Davis-Bacon requirements met? (Use the appropriate question(s) in Chapter 23 to answer this question.)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion: <div style="height: 80px; border: 1px solid black;"></div>			